

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO <i>et al.</i>, Debtors.</div>	<div>PROMESA Title III No. 17 BK 3283-LTS</div>
<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Debtor.</div>	<div>PROMESA Title III No. 17 BK 4780-LTS (This court filing relates only to Case No. 17 BK 4780-LTS)</div>

**ENVIRONMENTAL INTERVENORS' REQUEST FOR PERMISSION TO FILE
TENDERED 11-PAGE SUR-REPLY**

COME NOW the Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc., Enlace Latino de Acción Climática, Comité Yabucoeño Pro-Calidad de Vida, Inc., Alianza Comunitaria Ambientalista del Sureste, Inc., Sierra Club Puerto Rico, Inc., Mayagüezanos por la Salud y el Ambiente, Inc., Coalición de Organizaciones Anti Incineración, Inc., and Amigos del Río Guaynabo, Inc., (hereinafter, the “Environmental Intervenors” or “we”) through their undersigned representative, and respectfully request permission to file the tendered SUR-REPLY to the REPLY submitted by the Financial Oversight and Management Board for Puerto Rico (FOMB), in its capacity as representative of the Puerto Rico Electric Power Authority (PREPA) pursuant to Section 315(b) of PROMESA, and the Puerto Rico Fiscal Agency and Financial Advisory Authority (AAFAF) (collectively, “the Government Parties”).

1. Although the Honorable Court has postponed a decision on several pending motions, including the Governmental Parties’ “URGENT MOTION IN LIMINE TO EXCLUDE TESTIMONY” (Doc. No. 1300), our OPPOSITION to said motion (Doc. No. 1319), and the

Governmental Parties' REPLY (Doc. No. 1338), we tender our SUR-REPLY to ensure that the record is complete and completely and fairly considered when the Court decides those motions.

2. In their REPLY, the Government Parties (i) incorrectly characterize the issues this Honorable Court must decide and the scope of the expert testimony we have proffered, in order to allege that the Environmental Intervenors should be denied a voice in these proceedings; (ii) falsely allege that we do not fit the criteria for permissive intervention and that we should not be allowed to intervene; (iii) incorrectly state that the Environmental Intervenors have conceded that we are not "parties in interest" and that we lack standing; and (iv) incorrectly argue that the expert witness evidence we have proffered is irrelevant to the present proceedings or, in the alternative, is more prejudicial than probative. In our tendered SUR-REPLY, the Environmental Intervenors address and fully disprove each allegation.

PRAYER

For the preceding reasons, the Environmental Intervenors respectfully request that this Honorable Court allow and duly consider our tendered SUR-REPLY, and grant the Environmental parties' request for status as permissive intervenors.

CERTIFICATION

I HEREBY CERTIFY that, on this same date, I filed this document electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties of record and CM/ECF participants in this case.

RESPECTFULLY SUBMITTED this 2d day of July 2019.

S/WILLIAM SANTIAGO-SASTRE

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